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APPLICATION GRANTED SO ORDERED

August 5, 2024

Via ECF

Hon. John G. Koeltl United States Courthouse 500 Pearl St. New York, NY 10007-1312

Re:

Norman et al v. Bank of New York Mellon Trust Company N.A. as

Trustee of Mortgage Management Assets Series 1 Trust, et al

Docket No. 1:24-cv-04737-JGK

Letter Motion for Extension of Time to File Motion to Dismiss

Dear Judge Koeltl:

This firm represents defendant PHH Mortgage Corporation, incorrectly sued herein as "PHH Mortgage Service as Loan Servicer and Agent", ("PHH") in the above-referenced action. We now also represent Bank of New York Mellon Trust Company, N.A. as Trustee for Mortgage Assets Management Series 1 Trust, incorrectly sued herein as "Bank of New York Mellon Trust Company N.A. as Trustee of Mortgage Management Assets Series 1 Trust, et al", ("BONY", collectively with PHH, the "Defendants") in this action.

The current deadline to file a motion to dismiss is August 9, 2024, with responses due by August 23, 2024, and replies due by September 3, 2024. Defendants respectfully request that the time to file a motion to dismiss be extended to and include **August 23, 2024**. Because this request affects the set deadlines for responses and replies to the motion, Defendants respectfully request that responses to the motion be due by September 13, 2024, and replies due by September 27, 2024.

This is Defendants' first request for an extension of time. The undersigned attempted to contact *pro se* Plaintiff Charmaine Thompson to seek her consent for this request but did not receive a response.

Respectfully submitted,

/s/ Leisl Kerechek Leisl Kerechek

Philadelphia, PA • Harrisburg, PA • Malvern, PA • Cherry Hill, NJ • Wilmington, DE • Washington, DC • New York, NY • Chicago, IL

August 5, 2024 Page 2

cc: All counsel of record (via ECF)

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Charmaine Thompson 831 East 220<sup>th</sup> Street Bronx, New York 10467 Plaintiff

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Financial Freedom Senior Funding Corporation 28 Liberty Street New York, New York 10005 Defendant

Financial Freedom Acquisition LLC 888 East Walnut Street Pasadena, California 91101 Defendant